

UNITED STATES DISTRICT COURT

for the

Northern District of California

FILED

Aug 10 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLANDUnited States of America
v.Troy Elias Walker, David Michael
Rembert, and Daljit Kamal Singh,

Case No. 4:21-mj-71274-MAG

FILED UNDER SEAL*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1, 2020 to August 9, 2021 in the county of Contra Costa in the
Northern District of California, the defendant(s) violated:*Code Section*

18 U.S.C. §§ 371, 922(a)(1)(A)

Offense Description

Conspiracy to Deal Firearms Without a License

Maximum Penalties: maximum term of 5 years
imprisonment; \$250,000 fine; 3 years supervised release;
forfeiture

This criminal complaint is based on these facts:

Attached Affidavit of Bureau of Alcohol, Tobacco, Firearms & Explosives ("ATF") Special Agent Dillon Phillips

☐ Continued on the attached sheet.

Approved As To Form:

Jonathan U. Lee

AUSA JONATHAN U. LEE

Dillon Phillips

Complainant's signature

Dillon Phillips, ATF Special Agent

Printed name and title

before me over the telephone pursuant to Fed. R. Crim. P. 4.1 and 4(d).
Sworn to ~~before me and signed in my presence.~~Date: 08/10/2021Virginia K. DeMarchi

Judge's signature

City and state: San Jose, California

Hon. Virginia K. DeMarchi, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Dillon Phillips, a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, state:

I. INTRODUCTION**A. Purpose of Affidavit**

1. I submit this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a complaint charging and arrest warrants authorizing arrests of the following individuals: Troy Elias WALKER (“WALKER”), David Michael REMBERT (“REMBERT”), and Daljit Kamal SINGH (“SINGH”) for one count of Conspiracy to Deal Firearms Without a License, in violation of 18 U.S.C. §§ 371 and 922(a)(1)(A), beginning on a date unknown, but no later than in or about October of 2020 (when Antioch Police Department began monitoring the dippin_sideways Instagram account), and continuing through at least August 9, 2021 (when I last observed a post on the dippin_sideways Instagram account, advising their customers that the package containing the items they ordered has not yet arrived), in the Northern District of California and elsewhere.

B. Sources of Information

2. I have based my statements in this affidavit on my training and experience, personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided by other agents and/or law enforcement officers, information gathered through law enforcement surveillance efforts, information provided by photographic and/or video-recorded evidence, information obtained through search warrants of social media or other accounts, and information provided by records and databases, as well as other sources. I believe these sources to be reliable. To the extent information is obtained through confidential informants, their reliability will be addressed separately herein. Where I refer to conversations and events, I often refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit also reflects my current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds. Where statements made by other individuals are referenced in this Affidavit, such statements are described in sum and substance and in relevant parts only. Similarly,

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1 where information contained in reports and other documents or records are referenced in this Affidavit,
2 such information is also described in sum and substance and in relevant part only.

3 **II. AFFIANT BACKGROUND AND EXPERIENCE**

4 3. I have been employed as a Special Agent (“SA”) of the Bureau of Alcohol, Tobacco,
5 Firearms and Explosives (“ATF”) since May 2020. I am a graduate of the Federal Law Enforcement
6 Training Center Criminal Investigator Training Program and the ATF National Academy Special Agent
7 Basic Training Course. My duties include the investigation of criminal violations of federal firearms,
8 explosives, and arson laws, as well as those involving violent crime. Prior to being an ATF Special
9 Agent, I was employed as a police officer with the Kansas City, Missouri Police Department from May
10 2012 to May 2020. During my employment with the Kansas City, Missouri Police Department, I was
11 assigned to the Patrol Bureau as a patrol officer, the Narcotics and Vice Division as an undercover
12 narcotics detective, and to the Patrol Bureau as a tactical response team officer.

13 4. As an ATF Special Agent, I have conducted and participated in both state and Federal
14 investigations involving the trafficking of firearms and distribution of controlled substances. I have
15 investigated and assisted in the prosecution of criminal street gangs engaged in illegal narcotics and
16 firearms trafficking. During these investigations, I have become familiar with various investigative
17 techniques, including electronic surveillance, the use of undercover agents and informants, and
18 controlled purchases of firearms and narcotics from suspects. I have participated in investigations as an
19 undercover agent purchasing firearms and narcotics from suspects. I have also participated in physical
20 surveillance operations and the execution of state and federal arrest warrants and search warrants,
21 resulting in state and federal prosecution of defendants. In addition to utilizing the aforementioned
22 investigative techniques, I have been required during these investigations to analyze information
23 resulting from traditional record searches, pen registers and trap-and-trace devices, cell phone cell-site
24 data, precision cell phone location data, utility records, and telephone toll and subscriber records. My
25 work with informants and cooperators has involved, among other things, monitoring meetings and
26 recorded conversations, and generally evaluating the reliability and truthfulness of an
27 informant/cooperator. Because of my training and experience, I have become familiar with the manner

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1 in which illegal firearm and drug traffickers smuggle, transport, store, conceal and distribute firearms
2 and drugs, as well, as how they collect and launder proceeds related to such activities. I am also familiar
3 with the manner in which these individuals use telephones, coded communications, false or fictitious
4 identities, and other means to facilitate illegal activities and thwart law enforcement investigations. I
5 have also consulted and discussed the investigations with other law enforcement officers and agents who
6 are experienced in these types of investigations.

7 5. I am an investigative or law enforcement officer of the United States, within the meaning
8 of Title 18 United States Code, Section 2510(7), and am empowered by law to conduct investigations of
9 and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

10 6. Because this affidavit is being submitted for the limited purpose of securing a criminal
11 complaint and arrest warrants for the three individuals named herein, I have not included every fact
12 known to me concerning this investigation. I have set forth only those facts that I believe are necessary
13 to establish probable cause to believe that beginning on a date unknown, but no later than in or about
14 October of 2020, and continuing through at least August 9, 2021, in the Northern District of California,
15 WALKER, REMBERT, and SINGH agreed with each other and with others to deal in firearms without
16 a license, in violation of 18 U.S.C. §§ 371 and 922(a)(1)(A).

17 **III. APPLICABLE LAW**

18 7. Under 18 U.S.C. § 371, it is unlawful for two or more persons to conspire either to
19 commit any offense against the United States, and one or more of such persons do any act to affect the
20 object of the conspiracy. The elements of this violation are as follows: (1) an agreement between two or
21 more persons to commit at least one of the charged crimes; (2) the defendant became a member of the
22 conspiracy knowing of at least one of its objects and intending to help accomplish it and; (3) one of the
23 members of the conspiracy performed at least one overt act for the purpose of carrying out the
24 conspiracy.

25 8. Under 18 U.S.C. § 922(a)(1)(A), it is unlawful for anyone who is not a licensed dealer to
26 engage in the business of dealing in firearms. The elements of this violation are as follows: (1) the
27 defendant willfully engaged in a business of dealing in, importing, or manufacturing firearms within the

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1 dates specified; and (2) the defendant did not then have a license as a firearms dealer, importer, or
2 manufacturer.¹

3 **IV. FACTS ESTABLISHING PROBABLE CAUSE**

4 **A. Overview of Investigation**

5 9. The Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) is investigating
6 firearms trafficking conducted via Instagram² and in-person by of a group of individuals, including
7 WALKER, REMBERT, and SINGH (collectively, the “Defendants”). Through the investigation, law
8 enforcement conducted undercover buys of 13 firearms and 17 Glock conversion switches³ collectively
9 from the Defendants. The purchased firearms included privately made firearms (i.e., “PMF”⁴) and
10 commercial/factory firearms. A Glock switch is a device that modifies a Glock-style pistol it shoots
11

12
13 ¹ A defendant must be engaged in a greater degree of activity than the occasional sale of a hobbyist or
14 collector, and the defendant must devote time, attention, and labor to selling firearms as a trade or business with
the intent of making profits through the repeated purchase and sale of firearms

15 ² Per news reporting, Instagram has no explicit policy prohibiting the sale of firearms on its platform.

16 ³ I know that a “switch” is a conversion device constructed from a machined, three-piece,
17 metallic Glock-type back plate, a metal “leg,” and a metal “selector” rod. The back plate houses the leg
and selector rod, which is designed to enable the pistol to fire in either semi-automatic or automatic
18 machinegun mode. The “switch” functions by using the forward extending metal leg to push the trigger bar down
and out of engagement with the firing pin as the slide closes, thereby allowing the firing pin to travel forward and
fire a round of ammunition.

19 I know Glock conversion switches to be machine gun conversion devices, which are specifically used to
convert a semi-automatic Glock pistol to a firearm that fires automatically, a machine gun, as defined further
below. For the purposes in this affidavit, the aforementioned machinegun conversion device will be referred to as
20 a “Glock conversion switch.” I know from training, experience, and consultation with other law enforcement
officers that Glock manufactures certain models of machine gun pistols; however, Glock does not manufacture
21 machine gun conversion devices for sale to the general public.

22 According to the Gun Control Act of 1968 (GCA), 18 U.S.C § 921(a)(23) defines the term “machinegun”
as the following: “has the meaning given such term in section 5845(b) of the National Firearms Act (26 U.S.C
5845(b)).” The National Firearms Act (NFA), 26 U.S.C § 5845(a), defines the term “firearm” to include “... (6) a
23 machinegun:...” Also, the NFA 5845(b) defines “machinegun” as the following: “...any weapon which shoots, is
designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual
24 reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such
weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended,
25 for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be
assembled if such parts are in possession or under the control of a person.” Consistent with the federal laws
26 described above, the Glock automatic switches described in this affidavit are machine guns.

27 ⁴ “PMF” is an ATF term used for identifying firearms that have been made from unfinished receivers and
that are absent manufacturer’s marks of identification.

multiple rounds automatically when the trigger is depressed without manual reloading, i.e., it fires multiple rounds in rapid succession by a single function of the trigger.

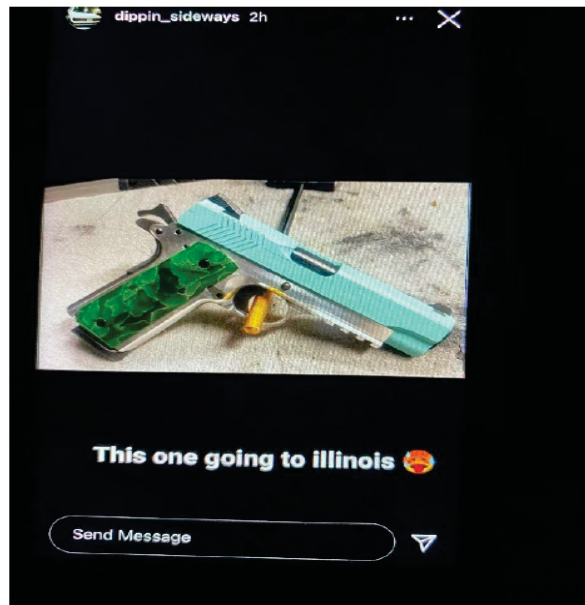
1. WALKER's Role and Use of Instagram

10. As detailed below, law enforcement identified WALKER as the primary user of two Instagram accounts with usernames “dippin_sideways” and “alpha_armoury” (collectively, the “Instagram Accounts”). Instagram is a social media platform that allows users to share videos and photographs, as well as public post comments and direct message other users. Agents have determined the Instagram Accounts are used to market firearms, ammunition, high-capacity magazines, machineguns, and at least one silencer for sale. Through a historic review of the two Instagram Accounts associated with WALKER, I have observed over 100 postings of firearms, firearm parts, ammunition, and magazines from about April of 2021 to August 9, 2021.⁵

11. As detailed below, the investigation has revealed that the Instagram Accounts are used to market and sell firearms within Contra Costa County and elsewhere in the San Francisco Bay Area, as well as other states. Below are two examples of posts from the Instagram Accounts, including one which purports the depict firearm for a customer in Illinois:



⁵ It should be noted that some of the posts and/or items posted may be duplicate postings.



2. *REMBERT Manufactures Firearms, SINGH Sources Glock Switches and Both Men Work with WALKER to Traffic Firearms*

12. As further detailed below, investigators identified REMBERT as an associate of WALKER's and involved in manufacturing homemade firearms marketed/sold via the Instagram Accounts. Investigators further determined that SINGH is a source of Glock conversion switches and associate of WALKER's in the firearms trafficking business.

B. The Defendants Are Not Licensed Firearms Importers, Manufacturers, or Dealers

13. As an ATF Special Agent, I have access to the licensing records of persons engaged in the business of importing, manufacturing, or dealing in firearms. I know that neither WALKER, REMBERT, or SINGH are licensed to engage in the business of importing, manufacturing, or dealing in firearms.

C. Identification of the First Instagram Account

14. In approximately April of 2021, a sergeant with the City of Antioch Police Department ("APD") advised me that he had been monitoring an Instagram account called "dippin_sideways" (hereafter, the "Instagram Account"). Among other posts, the sergeant observed a picture depicting a

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1 vehicle bearing California license plate #XXXX015. The sergeant further provided numerous
2 screenshots of several firearms posted as available for purchase on the Instagram page.

3 15. In an effort to identify the user of the “dippin_sideways” account, I conducted a query of
4 the California Department of Motor Vehicles (DMV) of the license plate #XXXX015. I know that
5 individual users of social media will often post photographs of themselves, their belongings, and/or their
6 residences. Here, I discovered the vehicle was registered to Troy Elias WALKER (i.e., WALKER),
7 with an address of 1257 Redwood Drive, Concord, CA 94520.

8 16. With the assistance of APD and the CI, through the course of the investigation, I
9 observed posts made by the user of the Instagram Account. The posts included photographs and/or
10 video of various firearms for sale, as well as Glock Conversion Switches (Machineguns). On or about
11 June 14, 2021, I obtained a federal search warrant for the Instagram Account and later obtained data
12 from the social media provider on or about June 29, 2021. My review of the messages and posts
13 indicated the user of the account was arranging firearms transactions with various individuals.

14 **D. ATF Identifies WALKER as the User of the Instagram Account and Conducts**
15 **Undercover Firearms Purchases from the Defendants**

16 17. In mid-April 2021, an ATF agent instructed an ATF Confidential Informant (hereafter,
17 the “CI”)⁶ to cold contact the Instagram Account and attempt to arrange for the purchase of a firearm.
18 At the direction of law enforcement, the CI exchanged direct messages with the user of the Instagram
19 Account (later identified as WALKER) to arrange the purchase an AR-15 style firearm for \$1,500.
20 Leading up to the transaction, WALKER provided the meeting location: 1279 Linden Drive, Concord,
21 California (hereafter, “1279 Linden Dr.”).

22 ///

23 ///

24 _____
25 ⁶ ATF CI is an individual who has worked for the ATF for an extended period and has received pecuniary
26 payments for his/her assistance. Originally, the ATF CI began working in exchange for avoiding a potential non-
27 fraud-related criminal charge. To date, the information provided to the ATF by ATF CI has been found to be
28 credible and much of it has been corroborated, including through recorded conversations and phone records. A
query of the ATF CI’s criminal history was conducted utilizing NCIC, which returned no record of arrests or
convictions.

1 *1. April 15, 2021: Firearm Transaction with REMBERT and WALKER*

2 18. On or about April 15, 2021, an undercover agent (hereafter, "UC" or "UC-1") and the CI
3 met with Troy Elias WALKER⁷ and David REMBERT at 1279 Linden Drive, Concord, CA.⁸ Upon
4 arriving at the meeting location, the UC and the CI learned WALKER was the person communicating
5 (through the Instagram Account) with the CI leading up to the transaction. During the meeting,
6 WALKER and REMBERT sold the UC an AR-15 style rifle for \$1,500. REMBERT accepted the
7 money from the UC for the firearm. During the meeting, the CI asked WALKER to provide the CI with
8 WALKER's phone number. WALKER advised the CI that he would send his number to the CI via
9 Instagram. As the UC and the CI left the location, the CI received a message from the Instagram
10 Account, which listed phone number XXX-XXX-2059. The CI and UC understood this phone number
11 to belong to WALKER.

12 19. During this undercover meeting, WALKER and REMBERT informed the UC and the CI
13 that they build firearms. Additionally, WALKER and REMBERT showed images of firearms
14 (including homemade firearms) on their cell phones to the UC and the CI. During this meeting,
15 WALKER informed the CI he had Glock "switches" (i.e., Glock Conversion Switches). WALKER
16 explained the Glock switches cost \$250 each.

17 20. During further conversation, the UC asked about future purchases of firearms. The UC
18 asked if he/she should contact WALKER, should he/she want to put in an order for something specific.
19 REMBERT confirmed the UC should contact WALKER. He explained WALKER would take the order
20 from the UC, and the UC would then need to send them a deposit for the firearm, which would cover all
21 the parts. Further, they would then order the parts, and they would let the UC know when the parts
22 arrived. REMBERT explained the time frame with "shipping" would be about 2 to 4 weeks from the
23 placement of the order to when the UC came to pick up the firearm. REMBERT explained that they
24 build custom order firearms. REMBERT explained people pay for the firearms in advance and then

25
26 ⁷ Investigators later identified WALKER and REMBERT through DMV and/or known booking
photographs, as well as based on their own stated names to the UC and others.

27 ⁸ All undercover transactions described in this Affidavit were surreptitiously recorded via audio
and/or video device unless otherwise noted.

1 they build them and “send them to them.” REMBERT explained he “goes all over the place buying
2 guns from all kinds of people...”

3 21. Based on REMBERT’s remarks, the UC’s recorded transaction, and my review of the
4 Instagram account, I believe REMBERT and WALKER were working together to run their stated
5 custom-manufacturing firearms trafficking business, which includes sending firearms to customers
6 located outside of the Bay Area.

7
8 **2. April 21, 2021, Firearm Transaction with WALKER, REMBERT, UM-1, and SINGH**

9 22. In late April 2021, the CI contacted WALKER via the Instagram account and arranged
10 for the purchase of a Glock-style handgun for \$1,200. WALKER provided a photograph of the gun to
11 the CI. On or about April 21, 2021, the UC and the CI met with WALKER, REMBERT, a third person
12 (later identified as SINGH), and fourth unknown male (hereafter, “UM-1”)⁹ at 1279 Linden Dr. During
13 the transaction, WALKER transferred the Glock-style handgun to the UC. The UC asked who he/she
14 should pay for the firearm and WALKER directed the UC to pay UM-1. The UC paid \$1,300 to UM-1
15 for the firearm.

16 23. During the conversations, the CI asked the group if any other firearms were available.
17 WALKER then turned to REMBERT and asked if he wanted to sell the UC and the CI anything.
18 REMBERT explained that in about a week he would have two or three of “these” (which the UC and CI
19 understood as a reference to the 1911 type semi-automatic handgun REMBERT was holding at the time
20 of his remark). The CI asked how the process of purchasing the firearms would work. REMBERT
21 explained, “...you tell us what you want, you drop a deposit, we order the parts.” REMBERT further
22 explained the buyer would pay for firearm and pick it up once completed. REMBERT stated the deposit
23 could be paid through Cashapp or Venmo.¹⁰ REMBERT explained that he can send the firearm to the
24
25

26 ⁹ Agents are continuing to investigate the identity of UM-1.

27 ¹⁰ Cash App and Venmo are payment services that allows users to transfer money to one another
using a mobile phone application or “app.”

1 UC/the CI, if needed, as they purported to reside outside of the Bay Area. WALKER and REMBERT
2 explained they were shipping a 1911 handgun to a customer in the State of Illinois.

3 24. Later, the CI asked WALKER how much the deposit would be for a Glock-style firearm;
4 WALKER responded \$800. WALKER added the CI would pay \$400 at the end of the process which
5 would bring the total cost to \$1,200. WALKER explained the deposit would cover the cost and ordering
6 of all the parts for the firearm. WALKER explained he only takes deposits, as he does not want to have
7 paid for the parts himself and then suffer a loss when the customer does not return to purchase the
8 firearm.

9 25. During the meeting, the UC and the CI discuss obtaining Glock switches from
10 WALKER. WALKER advised he would have to contact his source, in Vallejo, CA, in order to find out
11 if there were any available for purchase. UM-1 interjected at this time and advised that he knew of a
12 source who had Glock switches available, but they were priced high at approximately \$500 or \$600.
13 The UC inquired with UM-1 about his ability to build and sell a Glock-style firearm with a Glock switch
14 installed on it. UM-1 confirmed that he could build and sell a Glock-style firearm with a Glock switch
15 installed on it, but that the UC would have to check with WALKER on the pricing. The UC asked UM-
16 1 if everything went through WALKER, and he replied "yeah."

17 26. Based on the UC's participation in the above-outlined conversation, as well as the
18 investigation as a whole, I believe WALKER is responsible for running the marketing/sales side of the
19 firearms trafficking operation through the Instagram Account and others, including UM-1, REMBERT,
20 and SINGH, likely participate on the manufacturing/supply-side.

21 27. Later during the same undercover operation, SINGH arrived at the location and
22 introduced himself to the CI and the UC.¹¹ SINGH began to engage the other suspected co-conspirators
23 in conversation about firearms during this time. In SINGH's presence, the CI asked WALKER about
24 Glock switches. In turn, WALKER then asked SINGH about switches, which I believe is consistent
25 with WALKER working with SINGH to supply/sell Glock switches. SINGH responded by offering to
26

27 ¹¹SINGH was later identified through a California DMV photograph shown to the UC and CI.
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1 sell the switch off of his firearm to the CI. The CI brought this offer to the UC's attention. The UC then
2 also asked about purchasing the switch from SINGH. SINGH then produced a handgun from his
3 waistband to display it to the UC and CI. The UC observed the firearm had a Glock switch installed on
4 it. The UC attempted to purchase the firearm, but SINGH then advised that the firearm was not for sale.
5 The UC again asked about purchasing a Glock switch and SINGH advised he could obtain them "all
6 day." SINGH advised that he would sell the UC the Glock switch off of the firearm. Later, SINGH
7 asked WALKER if he would come with him to the house. During this time, SINGH, WALKER, and
8 UM-1 departed the residence.

9 28. A short time later, they returned to the location at which time SINGH advised that he had
10 called to check "inventory" on Glock switches, and that the last one available at that time was the one on
11 his Glock handgun. SINGH further explained his associate had informed him more switches were on
12 back-order and they had to wait about three weeks to get the "rest of them." The UC understood
13 SINGH's comments to mean that SINGH had a source of supply for more Glock switches, but more
14 time was required to obtain them because they were allegedly out of their inventory. SINGH ultimately
15 sold the UC a Glock conversion switch for \$275. Further, SINGH also advised that he brought two more
16 firearms to show the UC and the CI, as he heard they were doing good "business."

17 29. During the meeting, REMBERT installed the Glock conversion switch (purchased from
18 SINGH) onto the Glock-style handgun that the UC had purchased from UM-1. Additionally, SINGH
19 sold a Smith & Wesson Shield 9mm pistol for \$1,150 and a Glock-style handgun for \$1,200 to the UC.

20 30. Regarding the Smith and Wesson Shield firearm, the UC noted to SINGH that the S&W
21 Shield did not have a visible serial number because it had been obliterated or obscured, as evident from
22 the firearm's appearance. SINGH pointed to REMBERT and stated, "he did that for me." The UC
23 understood SINGH to be conveying that REMBERT had removed the serial number. While the UC
24 discussed this firearm with SINGH, REMBERT interjected and advised that the firearm previously
25 belonged to him. Following the installation of the Glock switch, REMBERT and SINGH gave the UC
26 specific instructions on the functionality of the Glock switch.

31. SINGH discussed the sale of more Glock switches with the UC. SINGH explained he could obtain four Glock Switches for the UC in the time frame of about two to three weeks. The UC asked SINGH if he should contact WALKER regarding this transaction. SINGH explained to the UC should go through WALKER to arrange this future transaction. Again, this direction is consistent with WALKER working with others to traffic firearms.

3. May 6, 2021: Firearm Transaction with WALKER, REMBERT, and another individual

32. In early May 2021, the CI communicated with WALKER via the Instagram Account, as well as text messages. WALKER informed the CI of multiple firearms available for purchase, including a custom-made Glock pistol (sourced by REMBERT for \$1,700), a Glock pistol in the box (sourced from WALKER for \$1,600) and four Glock switches (sourced from SINGH for \$1,050). WALKER provided several photographs of the Glock conversion switches and firearms available for purchase to the CI via Instagram and text message.

33. On or about May 6, 2021, the UC and the CI met with WALKER, REMBERT, and a known female (hereafter, “F-1”)¹² at 1279 Linden Drive. During the meeting, the UC purchased four Glock conversion switches from WALKER for \$1,050, as well as a privately manufactured P80 firearm with a Glock slide (Caliber: 9mm, slide SN: YSZ617) for \$1,050. The UC also purchased a Glock handgun which came with a Glock conversion switch (Model: 34, Caliber: 9mm, SN: BENF939) from REMBERT for \$2,000—REMBERT installed the switch onto this firearm during the meeting. Also, the CI purchased a privately manufactured P80 firearm (Caliber: 9mm, S/N: N/A) from REMBERT for \$1,700.

34. During the meeting, the UC asked WALKER if SINGH would be coming over. WALKER advised the UC that he already had the switches. The UC reminded WALKER that SINGH had told the UC that he was supposed to be getting a switch for free. Ultimately WALKER called

¹² F-1 is an individual whose identity is known to law enforcement. Not all of her statements, conduct and involvement have been set forth herein for the sake of brevity and because this information is not necessary to establish probable cause for this complaint.

1 SINGH and let the UC speak to him on the phone. The UC recognized the voice of the person on the
2 phone to be that of SINGH. SINGH explained the free switch would be coming with a firearm which
3 hadn't been built yet. The UC asked SINGH if the price for the four switches was \$1,050 and SINGH
4 confirmed this.

5 35. During the meeting, the UC asked REMBERT if he could install the purchased Glock
6 conversion switches on the two P80 handguns which were purchased. REMBERT agreed and stated the
7 cost would be \$50 for the installation of each switch. In their presence, REMBERT installed the Glock
8 conversion switches on the two firearms. The UC paid REMBERT \$100 for the installations.

9 36. The UC also asked if he/she could buy switches and WALKER confirmed that UC could
10 do so. The CI then asked who had "rocket launchers." WALKER informed the CI about a three-round
11 burst M-16, which had a grenade launcher and explained it cost \$5,000. Later, WALKER then showed
12 a picture from his phone to the UC and the CI of an AR-style rifle with a launcher type tube attached to
13 the bottom of it.

14 37. While discussing the quality of firearms, REMBERT explained if a firearm does not
15 work, then it does not leave here. REMBERT added he does not want the UC and the CI coming back
16 with firearms that do not work; he wanted them to come back with more money. The UC understood
17 that REMBERT wanted to continue doing business (i.e., selling firearms and Glock switches) with the
18 UC and the CI.

19 38. While preparing one of the Glock frames for installation of a switch, REMBERT
20 explained how he had previous training to learn how to do this type of work. REMBERT explained he
21 had just failed so far to make it legit and legal. REMBERT explained a new opportunity had come up
22 that his wife had found, which could make this very "profitable." REMBERT explained this did not
23 even account for his building "ghost guns" on the side. REMBERT described how he would never stop
24 making these types of firearms as long as he could obtain the parts. REMBERT elaborated about all of
25 the firearms he made function. REMBERT stated he had only one malfunction out of 2,000 firearms.
26 The UC understood REMBERT's remarks to convey that REMBERT manufactured/modified a high
27

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1 volume of firearms and considered it a lucrative business. REMBERT's remarks are also significant
2 because he acknowledged that his firearms business is illegal (i.e., not legitimate).

3 39. Following the transaction, WALKER and F-1 provided plastic bags for the UC to place
4 the firearms in that he/she had purchased.

5 **4. June 2, 2021: Firearm Transaction with WALKER and REMBERT**

6 40. In May of 2021, the UC communicated via text message with WALKER, and agreed to
7 meet ultimately on or about May 27, 2021, to purchase several firearms and Glock conversion switches
8 from WALKER and his associates. Prior to the meeting, WALKER advised the UC that the Glock
9 conversion switches had not yet arrived from his source of supply (hereafter, "SOS"). They agreed to
10 meet on another day the following week.

11 41. The UC continued to communicate with WALKER, and they agreed to meet on or about
12 June 2, 2021, to complete the purchase of multiple firearms and Glock conversion switches. WALKER
13 advised that he had the Glock conversion switches in his possession and was holding them for the UC.

14 42. On or about June 2, 2021, the UC and a second undercover agent (hereafter, "UC-2") met
15 with WALKER and REMBERT at 1279 Linden Drive. The UC and UC-2 purchased the following
16 items from WALKER: 10 Glock switches for \$2,000; a privately manufactured P80 firearm with a
17 Glock slide (SN: Obliterated) and Glock switch installed on it for \$1,000; an Anderson Manufacturing
18 AR-15 (Caliber: Multi, S/N: 19222950) for \$1,500; and a Norinco SKS rifle (Caliber: 7.62x39, S/N:
19 22004052) for \$1,200. Additionally, REMBERT sold them a Vulcan Mac-style handgun (Caliber:
20 9mm, S/N: G5775) for \$1,200 and REMBERT gave a free Glock switch to UC-1.

21 **5. July 14, 2021: Firearms Transaction with WALKER and REMBERT**

22 43. In July of 2021, UC-1 communicated via text message with WALKER. They agreed to
23 meet on or about July 14, 2021, so UC-1 could purchase a Glock model 48 handgun for \$1,600, from
24 WALKER. On such date, UC-2 met with REMBERT at 1279 Linden Drive. UC-2 purchased the
25 following items from REMBERT at the address: a Glock model 48 handgun for \$1,600, a Glock model
26 36 handgun for \$1,400, and a Glock conversion switch for \$200. REMBERT then charged \$50 to install
27 the Glock conversion switch on to the Glock model 36 pistol purchased by UC-2.

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[UNDER SEAL]

E. The Defendants Work Together to Market, Sell, and Manufacture Firearms via the Instagram Accounts

44. Through the investigation, law enforcement identified a second Instagram account associated with WALKER operated under the username of “alpha_armoury.” On the original Instagram Account (i.e., “dippin_sideways”), WALKER (or one of his associates) posted a poll asking account followers whether he/they should start a second Instagram account to showcase their work building/altering custom firearms. Later, the Instagram account “alpha_armoury” was identified as connected to WALKER. Based on subpoena returns, the subscriber/user of the “alpha_armoury” account listed WALKER’s telephone number, although the username was left as blank. This telephone number is the same one provided to the CI, as detailed above, and used by WALKER to communicate with the UC to negotiated firearms transactions.

45. Based on the totality of the investigation, I believe WALKER relies on and conspires with REMBERT, SINGH, and others to supply/facilitate their firearms trafficking operation. Further, I believe this illegal operation is conducted, in whole or in part, via the Instagram social media platform.

V. REQUEST TO SEAL

46. The materials now before the Court—namely, this Affidavit and the accompanying and application for a search warrant—reveal sensitive details of an ongoing criminal investigation. Accordingly, in order to protect the integrity of that investigation, to guard against the flight of fugitives, and to better ensure the safety of agents and the public, I request that those materials—together with any search warrants that issue thereon—be sealed until further order of the Court, with the qualification that law enforcement agencies be authorized to share these materials as necessary to execute any warrants.

VI. CONCLUSION

47. Based on the information set forth above, I submit that there is probable cause to believe that beginning on a date unknown, but no later than in or about October of 2020 (when Antioch PD began monitoring the dippin_sideways Instagram account), and continuing through at least August 9, 2021 (when I last observed a post on the dippin_sideways Instagram account, advising their customers that the package containing the items they ordered has not yet arrived), in the Northern District of

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[UNDER SEAL]

1 California and elsewhere, WALKER, REMBERT and SINGH agreed and conspired with each other to
2 deal firearms without a license, in violation of 18 U.S.C. §§ 371 and 922(a)(1)(A).

3 48. Accordingly, based upon the foregoing, I respectfully request that the Court sign the
4 requested criminal complaint and issue the requested arrest warrants.

5 I declare under penalty of perjury that the statements above are true and correct to the best of my
6 knowledge and belief.

7
8 *Dillon Phillips*

9 DILLON PHILLIPS

10 Special Agent

11 Bureau of Alcohol, Tobacco, Firearms and
12 Explosives

13 Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1 and 4(d) this
14 10 day of August, 2021.

15
16 *Virginia K. DeMarchi*

17 HONORABLE VIRGINIA K. DEMARCHI
18 United States Magistrate Judge

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28 PHILLIPS AFF. IN SUPPORT OF CRIMINAL COMPL.
[UNDER SEAL]